

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

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JESUS MANUEL MATTEI RODRIGUEZ
WANDA SARAI DIAZ RIVERA

* CASE NO. 15-06118/ESL

Debtor(s)

* CHAPTER 7

FIRSTBANK PUERTO RICO

* INDEX

Movant

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JESUS MANUEL MATTEI RODRIGUEZ
WANDA SARAI DIAZ RIVERA
WILFREDO SEGARRA MIRANDA, ESQ.
CHAPTER 7 TRUSTEE

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Respondent (s)

**DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM STAY
PURSUANT TO 11 U.S.C. 362 DOCKET NO. 27**

TO THE HONORABLE COURT:

NOW COME, JESUS MANUEL MATTEI RODRIGUEZ and WANDA SARAI DIAZ RIVERA, debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. FirstBank Puerto Rico, filed a motion for relief from stay basically alleging that debtors is in post-petition arrears in the mortgage loan payments.
2. The debtors hereby respectfully respond that their intention is to surrender the real property which serves as collateral to FirstBank.
3. The debtors *Statement of Intention*, filed at docket no. 1, provides for the "surrender" of the collateral to FirstBank.

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4. Therefore, the debtors hereby consent to the lift of stay in favor of FirstBank, in the present case, to allow FirstBank to foreclose on its collateral ***IN REM***.

5. By consenting to the "lifting of the stay" in favor of FirstBank in the above captioned Index, the debtors does not waive their right to be discharged of their **personal liability** concerning FirstBank claim. 11 USC Section 524(a).

WHEREFORE, debtors respectfully request from this Honorable Court to authorize the present response to the motion for relief from stay filed by FirstBank, docket no. 27.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of same to: the Chapter 7 Trustee, Wilfredo Segarra Miranda, Esq.; Jose F. Cardona Jimenez, Esq., Cardona Jimenez Law Offices,PSC, Counsel for FirstBank Puerto Rico; I also certify that a copy of this motion was sent via regular mail to the debtors/respondent Jesús Manuel Mattei Rodríguez and Wanda Sarai Díaz Rivera, Hacienda San José, 919 Vía Pintada La Estancia, Caguas PR 00727.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 25th day of February, 2016.

/s/Roberto Figueroa Carrasquillo
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